

Emily Mineer
Unit Manager Lia Sophia Jewelry

06/14/06

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from successfully continuing as a Unit Manager and Advisor for Lia Sophia Jewelry. I know the aim of the proposed rule is to protect the public from "unfair and deceptive acts or practices," yet some of the sections in the proposed rule will make it very difficult, if not impossible, for me to sell Lia Sophia's products, as well as for my fellow team members to continue building their dream.

I started with Lia Sophia 1 year ago. I had only a glimmer of the potential and no idea of the freedom or joy this opportunity would mean to me and so many others – especially so quickly. When the opportunity with Lia Sophia came along I had just been displaced from the fulltime workforce due to serious repetitive motion injuries. I was faced with finding a whole new career and line of work, since my injuries prevented me from continuing in the line that all my training and past experience was. My husband was facing his own health problems and the medical bills were growing. I didn't think Lia Sophia was the answer to our dilemma but I thought it might enable me to supplement whatever other opportunity worked out. Well, I discovered very quickly that being an advisor and manager with Lia Sophia Jewelry was not only the answer, but a fulfillment of dreams that I never dared dream! My family is now fully dependent on and supported through my direct selling business. The future of my family is dependent on the stability of the direct selling industry. Not only that, I manage a whole team of women who also help support their families with the wonderful opportunity Lia Sophia Jewelry offers us. We sell exceptional products and have very happy customers who love the product they buy. This new ruling could be so detrimental to so many hard working, honest women and their families.

One of the most confusing and burdensome sections of the proposed rule is the seven-day waiting period to enroll new Advisors with Lia Sophia Jewelry. Our starter kit only costs \$99. In most cases this \$99 is paid by me! People buy TVs, cars, and other items that cost much more and they do not have to wait seven days. This waiting period gives the impression that there might be something wrong with the company or the compensation plan. Under this waiting period requirement, I will need to keep very detailed records when I first speak to someone about Lia Sophia Jewelry and will then need to send in many reports to my company headquarters.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Lia Sophia is found guilty. Otherwise, Lia Sophia and I are put at an unfair advantage even though Lia Sophia has done **nothing** wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft, I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to Lia Sophia headquarters and then wait for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson - "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I appreciate the work that the FTC does to protect consumers, yet I believe this proposed new rule has many unintended consequences and there are less burdensome alternatives available to achieving your goals.

Thank you for your time in considering my comments.

Respectfully,

Emily Mineer